Path to Success

(and Avoiding the Road to Denial)

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Path to Success

USAC

- Provides more guidance and more outreach
- Send targeted reminders of deadlines

Applicants and service providers can:

- File Online
- Correct ministerial and clerical errors
- Read instructions and communications
- Ask questions

Being Successful

- **File Online**
  - Avoid errors
  - Allow popup messages in your browser
- **Technology Planning**
- **Competitive Bidding and Form 470**
- **Eligible Services**
- **Requesting Discounts and Form 471**
- **Starting Service and Form 486**
- **Document Retention**
- **Other Program Compliance Issues**
- **Appeals and Requests**

Technology Planning -1

- Create your technology plan prior to your Form 470
  - Own and design a plan that reflects your needs
  - Review the definition of basic telephone service
    - PBX and Centrex require technology plans

Technology Planning - 2

- **Address all five required elements**
  - Goals and strategies related to technology
  - Professional development strategy
  - Needs assessment of eligible services
  - Budget
  - Ongoing evaluation process
- **Find a USAC Certified Technology Plan Approver (TPA) to review and approve your plan**
  - Use the Certified Tech Plan Approver tool on website to locate an approver for your entity type, state, etc.
- **Get your plan approved before you file the Form 486 or services start, whichever is earlier**
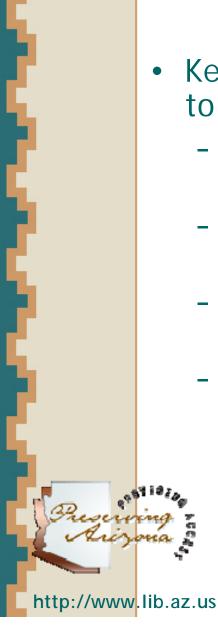
Technology Planning -3

- Make sure your plan covers all 12 months of the funding year (or the period for which discounts are requested)

- Update your plan if necessary and when making changes in your technology implementation.

- Remember major changes need re-approval by TPA.

- Keep a copy of your approval letter
  - If your state maintains this information on a website, print a hard copy for your files

- Keep a copy of your tech plan handy

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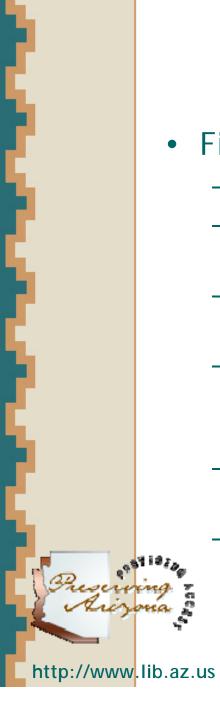
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Competitive Bidding / 470

- Keep the following in mind when getting ready to file your Form 470
  - You will describe the services you are seeking on your Form 470 (and RFP, if using one)
  - You should be ready to accept bids when you post the Form 470 or release your RFP
  - Your 28 days starts when you post the 470 or issue the RFP, whichever is *later*
  - You should tailor your RFP to *your* needs and base it on *your* technology plan
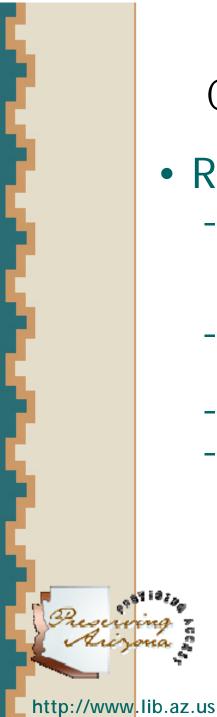
Competitive Bidding / 470

- **Filing your Form 470 (continued)**
  - Post for the correct category(ies) of service
  - List the services that you are seeking, which are based on your tech plan – not a laundry list.
  - Form 470 must be detailed enough that service providers can ask questions and formulate bids
  - Define scope of work to include all entities receiving services, including non-instructional facilities (NIFs)
  - Properly indicate if you have or will have a Request for Proposals (RFP)
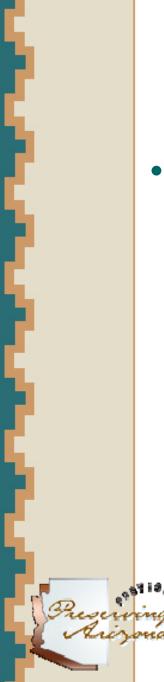 - Wait 28 days after RFP or Form 470 posting – whichever is later.

Competitive Bidding / 470

- ## Run an open and fair process
  - "Open" means there are no secrets in the process (all bidders know what is required of them and any information is shared with all)
  - "Fair" means that bidders are treated the same
  - Discussions with vendors must be neutral
  - Avoid conflicts of interest, e.g.:
    - Independent consultant ⇔ service provider
    - Applicant ⇔ service provider

Competitive Bidding / 470

- Run an open and fair process (continued)
  - Design your bid evaluation process carefully
    - Weigh your criteria, with price of the eligible products and services as the factor that is weighted most heavily
    - Save evaluation sheets, winning and losing bids, and other documentation
  - Follow state, local and FCC procurement rules
  - Document EVERY PART of your process
  - If you don't receive any bids, document that fact with a memo to your file

Selecting the Winning Bid

- WAIT 28 DAYS after your Form 470 is posted and your RFP is issued before:
  - Selecting your service provider, and
  - THEN sign and date the contract, and
  - THEN file your Form 471, and
  - THEN certify your Form 471
- Refer to your 470 Receipt Notification Letter for the allowable contract date

Selecting the Winning Bid

- Choose the bid that is the most cost-effective, for meeting educational and technology plan goals in the marketplace

- with price as the primary factor
  - Price evaluation must consider only ELIGIBLE products and services
  - Don't use E-rate to subsidize the procurement of ineligible or un-requested products or services

- Review the "Free Services Advisory" on the USAC website
  - A single bid is not necessarily cost-effective

Selecting the Winning Bid

- ## Services must be one of the following:
  - – Provided under tariff or a month-to-month arrangement (Form 470 filed annually) OR
  - – Provided under a contract
    - Internal Connections and Basic Maintenance are presumed to be contracted services
    - Tariffed services provided under a contract are contracted services

Eligible Services

- If you're not certain of the eligibility of some services, include them in separate funding requests (FRNs)
  - "When in doubt, break it out."
- Telecommunications Services MUST be provided by telecommunications carriers eligible to provide such services
- Use the Eligible Services List
- Cost-allocate out ineligible services

Consortia

- Consortium members must be knowing participants in the consortium
- Letters of Agency (LOAs) or other documentation of knowingness must include:
  - Consortium leader and consortium member names
  - Timeframe covered (not open-ended)
  - Types of services ("all E-rate eligible services" or more specific)
  - Signature, date and title of consortium member
  - May be required to file Form 479 for status of compliance with CIPA

Necessary Resources

- Necessary resources — review your budget to make sure you have included sufficient resources to:
  - Pay your non-discount share of services
  - Purchase or acquire products and services not eligible for discounts (hardware, software, electrical capacity, some maintenance) that are necessary to use any discounted services

Form 471 Reminders

- Mixing Priority 1 and Priority 2 services on the same Form 471 <u>will delay</u> your funding

- Make sure you cite the correct establishing Form 470 Application Number

- Make sure you choose the correct category of service

- If you are filing a paper form check your math; check it again

- Check your application; check it again

Form 471 Reminders

- You will have the opportunity to correct ministerial and clerical errors, HOWEVER:
  - It's better to do it right the first time
  - It's better to certify before the window closes
  - Know what is correctable and what is not
- It's better to submit your Item 21 attachment as soon as possible.

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Starting Service / 486

- You can file Form 486 early if services will start in July and you have your FCDL

- Don't put July 1 of the funding year as the service start date unless it really is the service start date
  - USAC may adjust the service start date
  - USAC won't pay invoices for products and services delivered before the adjusted date

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Starting Service / 486

- Verify your compliance with the Children's Internet Protection Act (CIPA)
  - Internet safety policy
  - Technology protection measure
  - Public hearing or meeting
  - Certain additional requirements
- Remember to collect Forms 479 from consortium members if required

Requests for changes

- ## Clearly identify your request
  - SPIN change
  - Service substitution
  - Invoice deadline extension
  - Service delivery extension
- ## Follow the website guidance for additional information to include
- ## If possible, file using the email provided in the appropriate guidance document
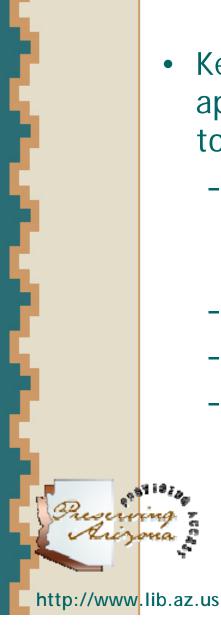
Red Light Rule

- Entities that owe a past-due debt to the US Government or USAC are put on Red Light.
- Status is tied to your tax ID.
- Applicants on Red Light may have applications denied and BEARs held
- Service Providers on Red Light have payments held.

Document Retention

- Keep all documentation related to applications for five years after the last date to receive service
  - Starts with technology plan and ends with delivery and installation of products/service
  - Know your E-rate equipment and services
  - Site visits
  - Audits

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Audits

- Make sure that your documentation is in order. See website for complete list of documents that you should have available to support your applications.

- Make sure that your physical inventory lists are in order so that you can quickly identify equipment.

- You will have an opportunity to respond to the audit report.
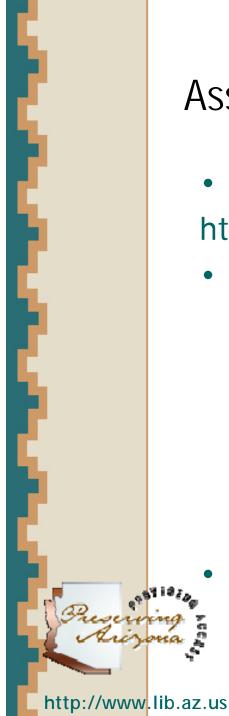
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Appeals

- Write "Appeal" at the top
- Clearly identify / include:
  - The USAC decision notification ("the FCDL for BEN ###### dated May 15, 2006")
  - The reason for your appeal
  - Any supporting documentation that will help USAC understand and review your appeal
- If possible, send your appeal by email to appeals@sl.universalservice.org
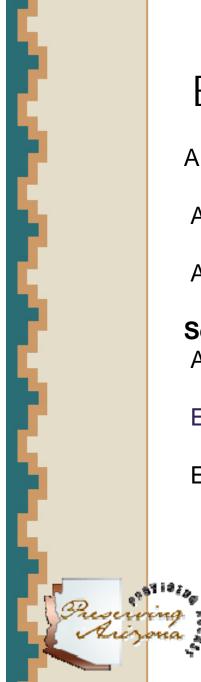
Assistance

- Schools and Libraries / USAC web site

http://www.usac.org.sl/

- Client Service Bureau
    - Use the "Submit a Question" link on the web site
      http://www.slforms.universalservice.org/EMailResponse/EMail_Intro.aspx
    - Fax toll-free at 1-888-276-8736
    - Telephone toll-free at 1-888-203-8100
- Form instructions

E-rate resources for AZ

Arizona Department of Education (ADE)
http://www.ade.az.gov/erate
Arizona State Library Archives and Public Records
http://www.lib.az.us/erate/
Arizona State Procurement Office (AZSPO)
http://www.sl.universalservice.org/Funding/OpenData Search/default.asp
Arizona Government Information Technology Agency (GITA)
http://gita.state.az.us/
E-rate Manager
http://www.eratemanager.com/
E-rate Central
http://www.eratecentral.com/
E-rate resource center
http://www.eschoolnews.com/resources/reports/ffl/index.c fm

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